Federal Organizational-Level EMS Workgroup Overview and Status

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Overview

- New language in E.O. 13423
- Typology of EMSs
  (What distinct types of EMS exist?)
- Questions and Answers
- Auditing

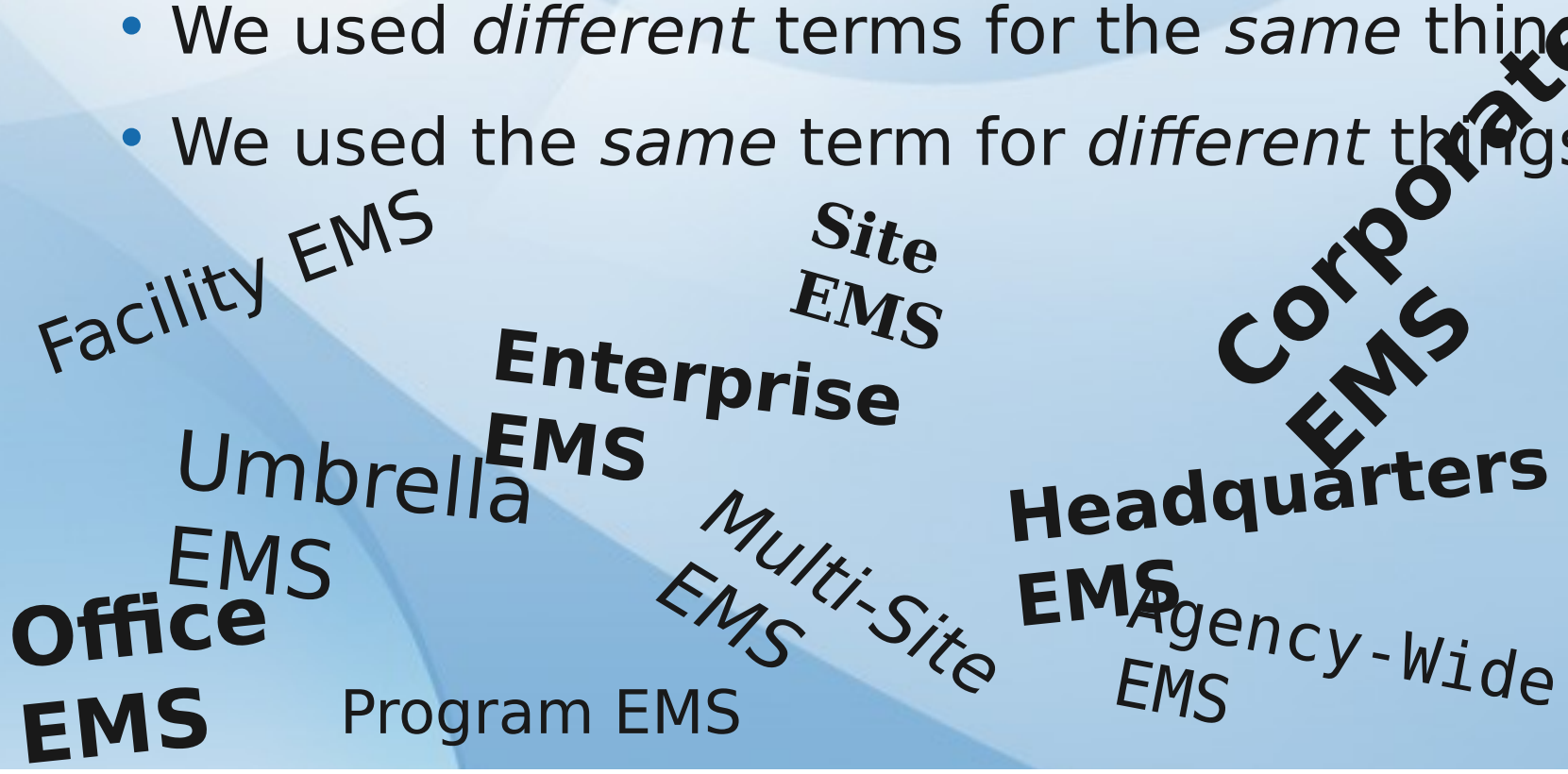
New Language in EO 13423

- EO 13148 previously required ' **“at all appropriate facilities”**
  - The Interagency Workgroup clarified this definition to include “organizations”
- EO 13423 requires ' **“at all appropriate organizational levels”**

Confusion of Terminology

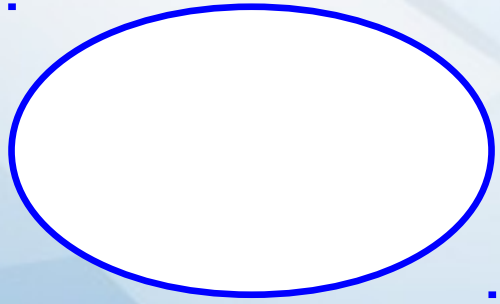
Workgroup members used many different terms

- We used *different* terms for the *same* thing
- We used the *same* term for *different* things

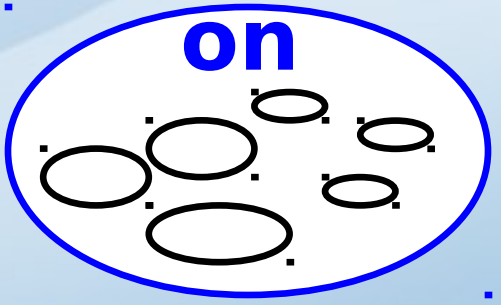


The EMS Typology

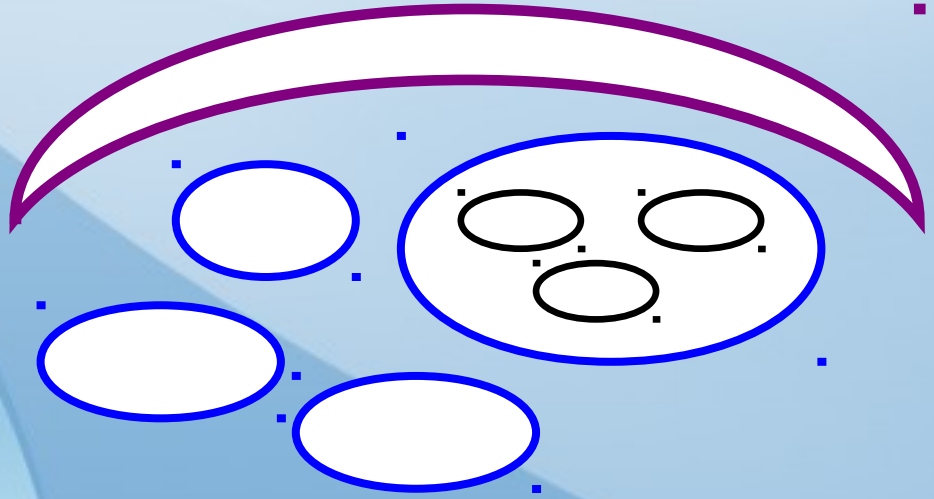
Facility



Multi-Site Organizati on

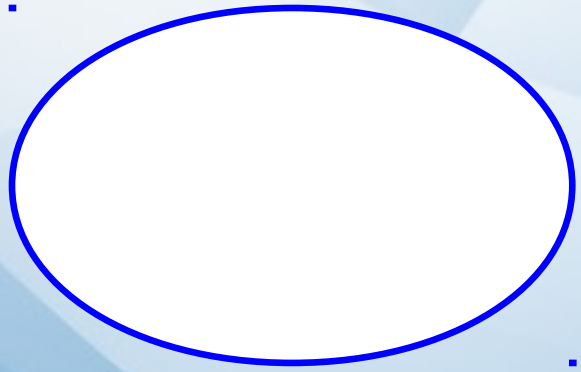


Higher-Tier



Facility EMS

EMS

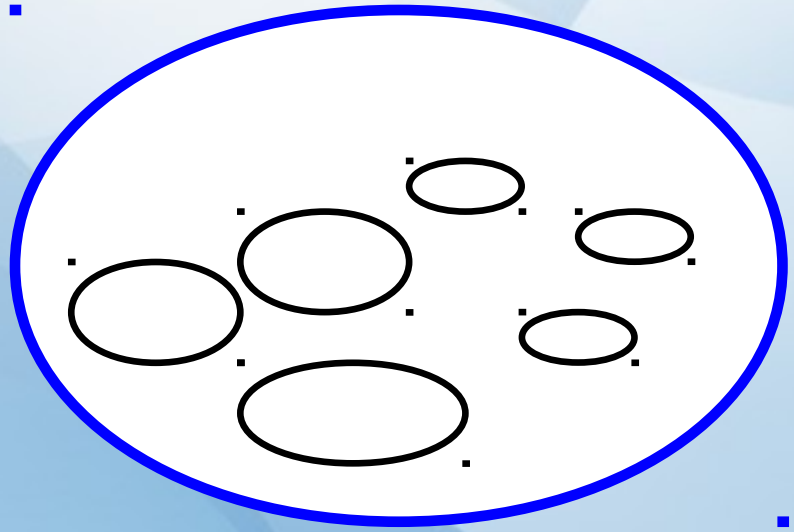


Other terms used:

- appropriate facility
- site EMS
- single-site organization EMS
- office EMS

Multi-Site Organization EMS

EMS

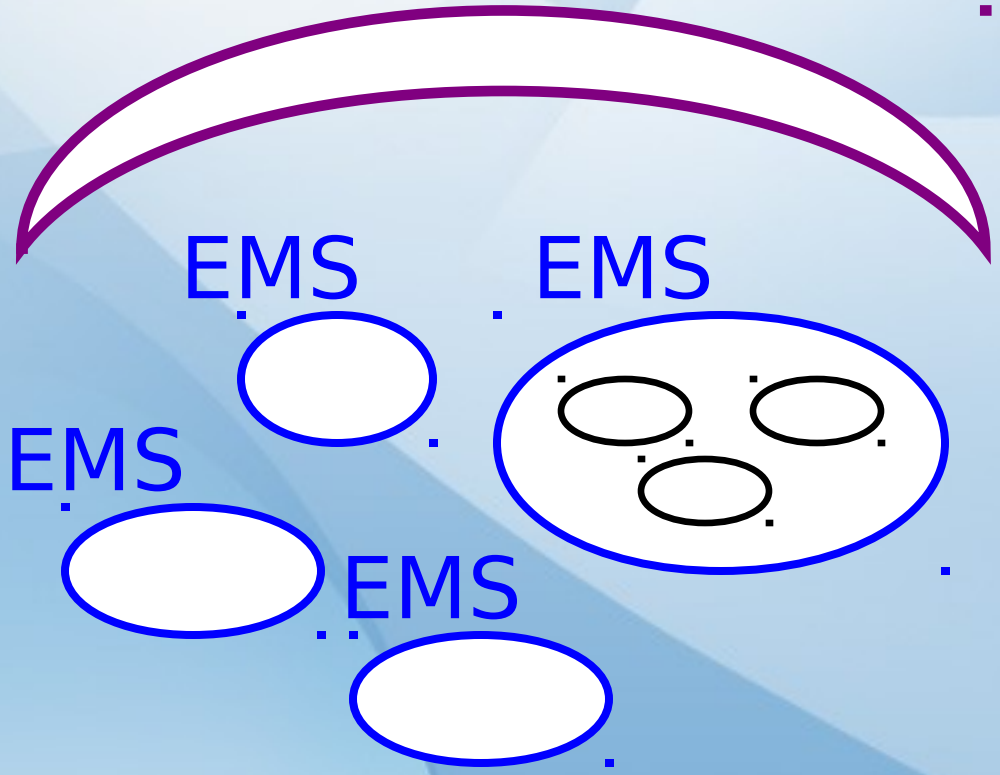


Other terms used:

- enterprise EMS
- corporate EMS
- agency-wide EMS
- multi-site EMS
- program EMS

Higher-Tier EMS

HIGHER-TIER EMS



Other terms used:

- umbrella EMS
- corporate EMS
- agency-wide EMS
- headquarters EMS
- program EMS

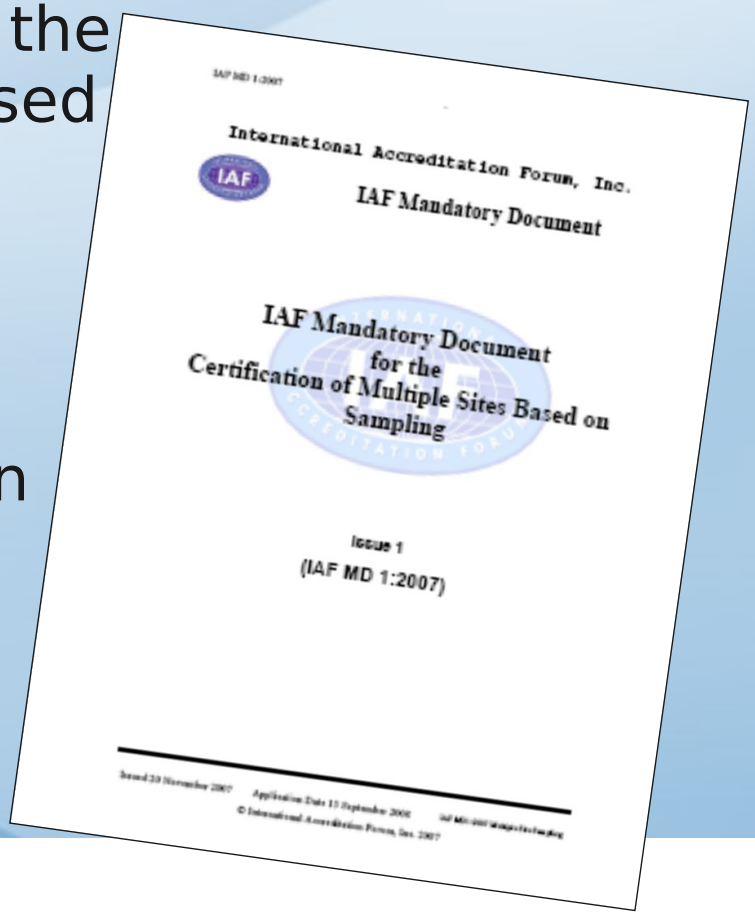
Questions and Answers Document

The Workgroup is developing a Q&A document

- Draft questions have been circulated for review
- Will include examples of how different Federal agencies have structured their EMSs will be included

Auditing a Multi-Site Organization EMS

- The International Accreditation Forum provides requirements and guidelines for auditor-certification organizations.
- IAF has issued requirements for the certification of multiple sites based on sampling [IAF MD 1:2007]. The document defines (among other things)
  - ‘multi-site organization’
  - when a multi-site organization is eligible for sampling
  - sampling methodology and sample sizes



Summary of Workgroup Activities

- Developed a typology of EMSs
  - will include examples from Federal agencies
- Developing a Q & A document
- Reviewing implications of multi-site EMSs for EMS audits

Federal Organizational-Level EMS Workgroup

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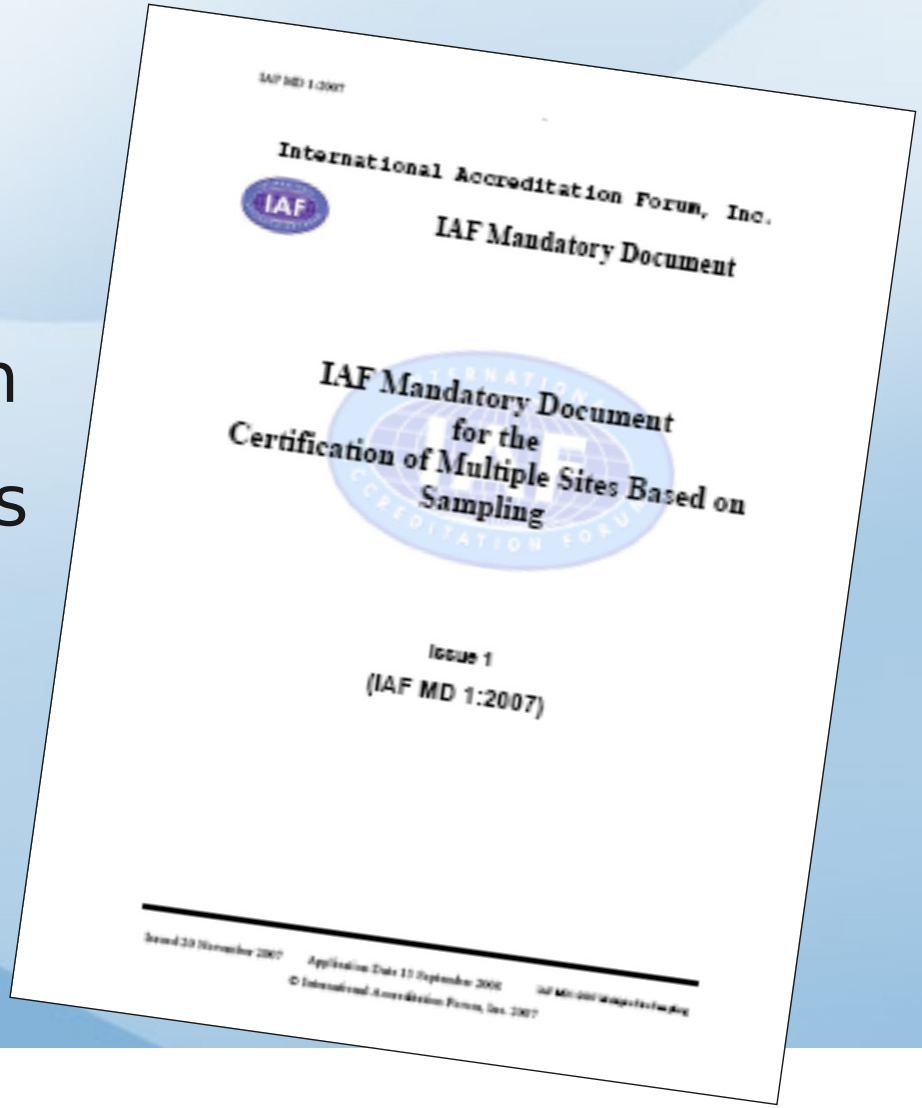
BACKUP SLIDES

Certification of Multiple Sites Based on Sampling

- Mandatory Document issued by the International Accreditation Foundation
- Establishes requirements for certifying audit organizations
- Provides a useful benchmark



Multi-Site Organization

Multi-site organization – an organization having

- an identified central function (hereafter referred to as a central office – but not necessarily the headquarters of the organization) at which certain activities are planned, controlled or managed and
- a network of local offices of branches (sites) at which such activities are fully or partially carried out.

– IAF MD1:2007 Multiple Site Sampling, § 1.5

Eligibility for Sampling

- “Normally … audits … should take place at every site of the organization that is to be covered by the certification”
- However, sampling may be used “where an organization’s activity subject to certification is carried out
  - in a similar manner at different sites,
  - all under the organization’s authority and control”

– IAF MD1:2007, § 0.2

Eligibility for Sampling (cont.)

- Processes at all the sites must be substantially of the same kind, and have to be operated to similar methods and procedures [§3.0.1]
- Where processes in each location are not similar (but are clearly linked) the sampling plan shall include at least one example of each process [§3.0.1]
- Management system shall be under a centrally controlled and administered plan and be subject to central management review [§3.0.3]
- Not all organizations meeting definition of “multi-site organization” are eligible for sampling [§3.0.6]

Factors Which may Restrict Use of Sampling

- Risk or complexity of activities
- Size of sites
- Variations in local implementation of the management system

– [§3.0.8]

Selection of Sample

- Partly selective, to include a representative range of sites [§5.1.1]
- At least 25% selected at random [§5.1.2]
- Selection may include considerations such as [§5.1.4]
  - Results of previous internal audits and management reviews
  - Records of complaints and other relevant aspects of corrective and preventive action
  - Variations in the size of sites
  - Variations in work procedures
  - Complexity of the management system and processes conducted at the sites
  - Environmental issues and extent of aspects and associated impacts
  - Differences in regulatory requirements
  - Geographical dispersion

Minimum Size of Sample

- For low-to medium risk activity, with <50 employees at each of n sites [§5.2.3]
  - Initial audit: square root of the number of remote sites $s = \sqrt{n}$ (rounded up)
  - Surveillance audit: $s = 0.6 \sqrt{n}$ (rounded up)
  - Re-certification audit: same as initial audit (where management system has proved effective, may be reduced to $s = 0.8 \sqrt{n}$ (rounded up)
- Central office shall be audited during each audit, and annually as part of surveillance [§5.2.5]

When to Use a Larger Sample

Size or frequency of sample *shall be increased* if risk analysis indicates special circumstances in respect of factors such as:

- Size of site and number of employees (e.g. > 50 employees at a site)
- Complexity or risk level of the activity and the management system
- Variations in working practices
- Significance and extent of aspects and associated impacts
- Records of complaints and other relevant aspects of corrective and preventive action
- Results of internal audits and management review

– [§ 5.2.6]

Sampling A Hierarchical Organization

- When the organization has a hierarchical system of branches (e.g. head (central) office, national offices, regional offices, local branches) the sampling model defined above applies to *each level*
- Example:

1 head office	visited at each audit cycle
4 national offices	s = 2; minimum 1 at random
27 regional office	s = 6; minimum 2 at random
1700 local branches	s = 42; minimum 11 at random

– [§ 5.2.7]